

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

-----X

**In re**

**Chapter 11**

**SEASONS CORPORATE LLC, *et al***

**Case No. 18-45284 (nhl)**

**Debtors.**

-----X

**TO THE HONORABLE NANCY LORD  
UNITED STATES BANKRUPTCY JUDGE:**

**QUALITY GLATT RESPONSE TO CLAIM OBJECTION**

Quality Glatt N.J. Corp, Quality Glatt Corp and Quality Glatt MD Corp  
(collectively, the “Quality Glatt Entities”), by their attorneys, Nutovic & Associates,  
respond to the Debtors’ objection to their claims as follows:

1. The Quality Glatt Entities had concession agreements with the Debtors which authorized the Debtors to collect proceeds of sales from their concessions but required the Debtor to segregate those funds and turn them over, minus certain contractual percentages.
2. Upon information and belief, the Debtors commingled those funds and accordingly the Quality Glatt Entities filed multiple claims against all the Debtors.
3. The total amount due to the Quality Glatt Entities at the time of the commencement of this case was no less than \$1,358,338.78 (the “Claim”) as set forth on the schedule annexed entitled “Exhibit B to Quality Glatt proof of claim”.
4. The Quality Glatt Entities opposes any effort of the Debtors to diminish the amount of the Claim, because there is no basis for doing so.

5. The Quality Glatt Entities also oppose any attempt to expunge their claims as being duplicative since they believe they are legally entitled to assert their claims against multiple entities who received the proceeds of concession sales.

6. Counsel to the Debtors has previously agreed to extend the Quality Glatt Entities time to respond to the objection to their claims for 30 days.

Dated: November 26, 2020

NUTOVIC & ASSOCIATES  
Attorneys for the Quality Glatt Entities

By: s/Isaac Nutovic  
Isaac Nutovic, Esq.  
261 Madison Ave, 26<sup>th</sup> Floor  
New York, New York 10016  
Tel: (212) 421-9100

Exhibit B to Quality Glatt proof of claim

All amounts listed below were calculated based on Debtors' computerized collections records

	<b>Lawrence</b>	<b>Queens</b>	<b>Lakewood</b>	<b>Clifton</b>	<b>Baltimore</b>
7/7/18	36,402.03	38,428.21	-	-	-
7/14/18	26,213.07	29,802.88	-	-	-
7/21/18	22,826.85	28,671.16	-	-	-
7/28/18	35,510.67	37,188.64	-	8,500.10	2,148.37
8/4/18	39,806.34	38,187.62	37,007.54	58,064.19	48,136.13
8/11/18	36,175.95	25,711.42	35,190.79	51,089.93	46,716.11
8/18/18	29,902.68	18,519.26	22,411.70	30,571.25	37,025.35
8/25/18	17,161.49	12,695.44	12,744.60	15,924.40	24,069.83
9/1/18	28,706.53	16,063.84	26,044.73	23,020.01	17,856.45
9/8/18	50,644.23	50,191.60	45,189.32	50,618.39	36,496.53
9/15/18	19,405.27	22,157.22	18,054.82	22,940.58	28,145.26
	<b>\$342,755.11</b>	<b>\$ 317,617.29</b>	<b>\$196,643.50</b>	<b>\$260,728.85</b>	<b>\$240,594.03</b>

Quality Glatt Corp supplied Lawrence and Queens stores.....\$660,909.29

Quality Glatt NJ Corp supplied Lakewood and Clifton stores.....\$457,372.35

Quality Glatt NJ Corp supplied Baltimore store.....\$240,594.03\$

**Total      \$1,358,338.78**